

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: 02/29/2008

Name of company covered by this certification: CallNet Communications, Inc

Form 499 Filer ID: 3744

Name of signatory: Felix Osimiri

Title of signatory: President

I, Felix Osimiri, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.
If affirmative:

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed ___Felix Osimiri_____

Attachment

Customer Proprietary Network Information (CPNI) Privacy Policy

- CallNet has not and will not engage in the practice of selling, lending, or licensing any CPNI to a third-party vendor for any purpose
- Customer data is housed in secure databases that are constantly monitored
- Third-party contractors sign Non-Disclosure Agreements and face civil penalties for improper use of the Company's proprietary information
- New employees undergo a security check before beginning employment with the Company
- Employees must adhere to the following CPNI policy contained in the employee handbook:

All company records and information relating to the company, its employees, or its customers are confidential and employees must, therefore, treat all matters accordingly. There can be no removal of any company-related information, including without limitation, documents, notes, files, records, oral information, computer files, equipment, office supplies or similar materials from the employer's premises without permission from the company. Additionally, the contents of the employer's records or information otherwise obtained in regard to day to day business dealings may not be disclosed to anyone, except where required for a legitimate business purpose. Employees must not disclose any confidential information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside the Company. Employees who are unsure about the confidential nature of specific information have the burden to ask their supervisor for clarification. Employees will be subject to appropriate disciplinary action, up to and including dismissal, for knowingly or unknowingly revealing information of a confidential nature.

In addition, when an employee leaves the company, the employee must return all Company related information and property that the employee has in his/her possession.